PLEASE TAKE NOTICE that on March 3, 2008, at 10:30 a.m. in Courtroom 14 of the above-entitled court, located at 940 Front Street, San Diego, California, Defendant EBTM plc will and hereby does move the Court for an order dismissing the complaint on the basis of lack of personal jurisdiction over EBTM.

This motion is made on the grounds that Defendant EBTM is a foreign corporation, was served with summons outside of the United States, and lacks sufficient contacts, ties, or relations with California that are required by due process of law to support this court's exercise of personal jurisdiction over EBTM.

This motion is based upon this notice, the accompanying memorandum of points and authorities, the declarations of Richard Breeden and Monty A. McIntyre, Esq., and all attachments thereto, and all papers and pleadings on file in this action.

3 Dated: January 23, 2008

SELTZER CAPLAN McMAHON VITEK

By: /s/ Monty A. McIntyre

Gerald L. McMahon
Monty A. McIntyre
G. Scott Williams
Attorney for Defendants
LOWLIFE CORPORATION LIMITED,
DALE MASTERS; and EBTM plc